REMARKS

Claims 1-9 are currently pending in the subject application and are presently under consideration. Favorable reconsideration of the subject application is respectfully requested in view of the following comments herein.

I.   Rejection of Claims 1-9 Under 35 U.S.C. §102(e)

Claims 1-9 stand rejected under 35 U.S.C. §102(c) as being anticipated by Crump *et al.* (US 6,484,206). It is respectfully requested that this rejection be withdrawn for at least the following reason. Crump *et al.* does not teach or suggest each and every element of the subject claim.

> A single prior art reference anticipates a patent claim only if it expressly or inherently describes each and every limitation set forth in the patent claim. *Trintec Industries, Inc., v. Top-U.S.A. Corp.,* 295 F.3d 1292, 63 U.S.P.Q.2D 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California,* 814 F.2d 628. 631. 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the … claim. *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Independent claim 1 recites a first protocol for *automatic sequential addressing* to enable *at least one I/O module* to receive network communications. A second protocol is utilized to provide the network communication to the *at least one I/O module.* This limitation provides for "a system wherein a module may be sequentially enabled (*e.g.* from left to right) from an adjacent module." Moreover, the subject invention allows "automatic sequential addressing…wherein each module may first become configured on the network and then subsequently enable a succeeding module to become network operational." (*See* page 6, lines 4-10).

In the Office Action dated April 23, 2003, the Examiner relics on column 4 line 34 to column 5 line 32 of Crump *et al.* to teach this limitation. However, Crump *et al.* does not teach or suggest a protocol for *automatic sequential addressing* that enables an *I/O module* to receive network communications. Rather, this section is directed to a

2

09/546,093   00AB108

___

system that enables a client to communicate to a server *via* a protocol network. However, the client mentioned in Crump *et al.* is not able to provide sequential addressing of the clients as recited in the subject claim.

Moreover, the communication link disclosed in Crump *et al.* does not disclose facilitating communication between a network and an I/O module as recited in the subject claim. Rather, Crump *et al.* discloses communication between a client (*e.g.* user) and a server (*e.g.* wireless telephone service). Therefore, there is no requirement for a sequential addressing schema, as recited in the subject claim, to be employed since each user is identified not by location (*e.g.* addressing) on a bus but rather by a preprogrammed ID number.

In view of at least the foregoing, it is respectfully submitted that Crump *et al.* neither anticipates nor suggests applicants' invention as recited in independent claim 1 (and claims 2-9 which depend therefrom), and this rejection should be withdrawn.

09/546,093   7/23/03   00AB108

II.   Conclusion

The present application is believed to be in condition for allowance, in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

AMIN & TUROCY, LLP

Himanshu S. Amin
Reg. No. 40,894

AMIN & TUROCY, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731

4